From: ANDERSON Jim M
To: Kristine Koch/R10/USEPA/US@EPA; Eric Blischke/R10/USEPA/US@EPA
Cc: Chip Humphrey/R10/USEPA/US@EPA
Subject: RE: Table 5.1-2 Discussion at LWG Management Meeting
Date: 02/25/2009 05:03 PM

Eric,

I added my thoughts in *red italics* below.

Jim

-----Original Message-----
From: Koch.Kristine@epamail.epa.gov
[mailto:Koch.Kristine@epamail.epa.gov]
Sent: Wednesday, February 25, 2009 2:17 PM
To: Blischke.Eric@epamail.epa.gov
Cc: ANDERSON Jim M; Humphrey.Chip@epamail.epa.gov
Subject: Re: Table 5.1-2 Discussion at LWG Management Meeting

Eric - See comments below.

Kristine Koch

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Eric

Blischke/R10/USEPA/US

To

Kristine Koch/R10/USEPA/US@EPA,

02/13/2009 09:00 AM

anderson.jim@deq.state.or.us

cc

Chip Humphrey/R10/USEPA/US@EPA

Subject

Table 5.1-2 Discussion at LWG Management Meeting

Jim and Kristine, here is my take on our discussion regarding Table 5.1-2. Please look this over and see if you have any concerns. If it is acceptable, I will touch base with Keith Pine to confirm.

General Comments 1a, 1b., 3a, 6, and 9 and specific comment 122: LWG agrees with the approach. No discussion took place. No resolution is

necessary.

General Comment 3b: EPA acknowledges the difficulty associated with assessing safety controls for overwater structures. We agreed that this is a low priority. Originally, I discussed with Keith the idea of a yes/no designation for the existence of plans. However, due to the myriad types of plans, this too is difficult. Right now, I just want to understand whether overwater structures and/or activities exist that could result in a release to the river.

I agree with the point they make, but I think that they should indicate for both prior and existing structures where activities have or are occurring that have the potential for releases. For example, if there has been or is currently offloading of hazardous materials or storage of hazardous materials, then this is important for the CSM. They don't need to cite (other than where it has been documented - e.g., spill reports) whether their has been or is current releases, but they do need to site the potential and where it is since it is important for the CSM to know how the contamination got where it is. Further, the FS is going to need to know the recontamination potential, so this would get more at the current potential, rather than historic. *I agree with Eric & Kristine.*

General Comment 4: We agreed that a strict screening step was not

necessary. However, EPA's position is that some assessment of the likelihood of a given contaminant migration pathway impacting the river is required. That assessment should include not only an assessment of whether the pathway is complete but also the magnitude of the contamination associated with the migration pathway. This information should be presented qualitatively for each chemical evaluated in the CSM in order to better understand the relationship between upland sources of contamination and the in-water distribution of contamination. *Eric, I agree with you. We discussed with the LWG…, them using the pathway priority ranking contained in our Milestone Rpts. However, our ranking isn't done on a SCM indicator chemical-by-chemical basis as you ask for. As I told Christine Hawley a month or 2 ago in an EPA/LWG mtg…, DEQ would be willing to work with the LWG to help provide detail for the table. I haven't heard from Christine, probably because the LWG hasn't directed her to work with us.*

For the RI, I'm ok with them doing a qualitative evaluation, but they are going to need to do a quantitative analysis for the FS to ensure adequate remedy selection based on risk reduction and recontamination potential. *Kristine, I'm not sure I understand what you're saying…, are you saying the LWG needs to do a quantitative risk & recontamination potential analysis for every complete upland to river pathway in the FS? I understood the that the LWG would: 1) assume in the FS that effective source control was in-place. 2) If DEQ, EPA, &/or the LWG thought that that effective source control was not a valid assumption at certain sites…, then the LWG would need to do a recontamination potential analysis for that site in the FS & factor it into the FS. 3) I assume that most all SMAs will do a recontamination potential analysis as part of RD/RA. If the results of those analyses show a threat of recontamination…, implementation of the remedy would likely be delayed & additional source control would be needed.*

General Comment 5: Key sources of contamination (e.g., the GE facility *Eric, if you're referencing the Station L site, that's PP&L*

not GE),

Zidell) should be discussed in the CSM even though they may not be on

the table. A footnote or some discussion should be included that notes

that the information is not on the table. The table should be viewed as

a reference for the CSM.

If the purpose of this table is only to discuss current sources (defined

as those sources that have or will be controlled after the site

listing), then I'm ok and they should remove all historical references.

However, when they discuss the CSM in the RI, they need to provide

supporting information on how the contamination got to the river (where

did it come from and how did it come to be located there). They can't

just say that the contamination was from historical sources without some

element as to link the historical source with the in-water sediment

contamination. I agree that they don't need to do that through this

table, but they need to figure out how to do it. *Kristine, I agree with you. For instance, the Albina Machine Works site.*

General Comment 7: We did not discuss this. The LWG approach is

probably adequate.

Again, they need to be able to state how the contamination got to be

located in the river sediments. If there is subsurface sediment

contamination, they need to explain how it got there. I agree with the

LWG that absent data, it is too hard to speculate whether or not there

is a groundwater plume, but if they suspect that river sediments are being impacted via groundwater plume in an area (to define the CSM) then they should have DEQ confirm this through upland sampling. *I agree with both Kristine & Eric.*

General Comment 8: We did not discuss this. The LWG does not agree with the approach but will do it. OK by me.

I don't know if 2 lines in the table will meet the needs since each of the outfalls is different - one outfall may be a source and another may not. Maybe the City (as an LWG member) has a creative way to deal with this. Again, the purpose is to define sources and how the contamination came to be located in the river sediments. If any one of these are doing that, even if there is no one upland source (e.g., contributions from multiple sources or cumulative upland sources to a single conveyance), then it needs to be discussed somewhere in the CSM. *I agree with Kristine. I don't think there much use in listing the 25-some municipal stormwater OFs in PH as 1 line in the table. The City probably won't like it, but I suggest they list in the individual OFs as separate lines. The City prioritized the OFs some time ago based on sediment contamination off the OF & a number of other factors. Perhaps that prioritization is all we need for the table.*

One other point, we discussed the CSM refinement process. We agreed that the CSM to be presented in the RI report will be further refined in the FS and as we move into RD at a given SMA. We would expect more detail regarding the link between upland and in-water sources as the CSM continues to be refined.

I agree. *Me too.*

Eric